

EXHIBIT 15

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DOCKET NO: 04 11572 JLT

SUSAN COONEY,
Plaintiff,

v.

HUMANISTIC PSYCHOLOGY
INSTITUTE, d/b/a SAYBROOK
INSTITUTE and MAUREEN O'HARA,
Individually,
Defendants.

AFFIDAVIT OF KEEPER OF RECORDS

I, (name) David Reisen, M.D., Keeper of Records for
(entity) David Reisen, M.D., make the following statement under the pains
and penalties of perjury:

With regard to the attached documents, produced in accordance with the subpoena duces
tecum of Dr. David Reisen state as follows:

- (1) The attached documents are true and accurate copies of business records of my
company or kept by my company;
- (2) The attached records were created or kept in good faith;
- (3) The attached records were created or kept in the regular course of business; and
- (4) It was the usual course of business for my company to create and keep such
records.

SIGNED UNDER THE PENALTY OF PERJURY THIS 6th DAY OF
December, 2005.

Keeper of Records

Signature: [Signature]

Print Name: David Reisen, M.D.

David Reisen, M.D.
Suite 501, 209 Harvard St.
Brookline, MA 02446-5005
Ph: 617-713-0388
Fax: 617-983-8873

Information Sheet

Name: Susan Cooney DOB: _____
Address: _____ Phone (day): _____
_____ Phone (eve): _____
Employer: _____ Occupation: REAL ESTATE-
Work Address Town + Country Properties

Social Security # _____ Gender: F: ☒ M: _____

Relationship Status:

Race/Ethnicity (optional):

Single _____ Married _____ Black _____ Asian/Pacific Islander _____
Separated _____ Divorced _____ White _____ Native American _____
Living with significant other _____ Hispanic _____
Other (specify) _____ Other (specify) _____

Spouse/Partner's Occupation _____ Employer: _____

Sources of family Income (check all that apply):

Full time work _____ Part-time work _____ SSI _____ SSDI _____
Public Assistance _____ Workman's Compensation _____
Child Support _____ Other (specify) _____

Total Family Income:

0-10K _____ 10-20K _____ 20-30K _____ 30-40K _____ 40-50K _____ 50-60K _____ 60+K _____

How will you be paying for therapy?

Self Pay: _____ Insurance: medicaid () medicare () other ()

Other (specify) _____

please bring card and insurance information with you to the first session

Educational Status: Full time _____ Part time _____ Highest grade completed _____

School: _____ Town _____

Information Sheet, p.2

Name: _____ DOB _____

Children & Ages: _____

Who lives with you? _____

Primary Care Physician: Dr. Catherine Taylor Phone: _____

Address Not - all OK,

Contacted: Y _____ N _____ If no, why not? _____

Current Medications (if none, please indicate this)

(dosages, length of use, reason prescribed, side effects)

None

Prescribing physician: _____

Address: _____

Phone: _____

Alcohol or drug history? (name of drug, dates used, extent of use, treatment interventions, current usage) _____

Please list any illnesses and hospitalizations (medical and psychiatric) you have experienced beyond normal childhood illnesses, including dates (if none, please indicate this):

None - basal cell 25 yr ago.

Allergies: Penicillin

Please list the names of previous psychotherapists, counselors, mental health and/or substance abuse providers you have seen, dates seen, frequency, and the approximate number of sessions, length of stay (if none, please indicate this):

Release of information signed: Y _____ N _____ Date _____

Treatment Plan, p.2

Date of review of Treatment Plan with patient: _____

Diagnostic Formulation: (Include discussion of the clinical process, the patient-therapist relationship, and psychodynamic formulation)

4/19/05 - got married again, got married again + divorced to Paul Duro. She had 7 miscarriages, worked on dissertation. Neglected Paul - amicable divorce. Was on fast track at MGH - They asked her to be a psychologist - she got her Ph.D. - on Trauma Case Focus + Re Road to Resiliency. This was 10/02 (MGH bid for her). Was told she couldn't get licensed because of the school she went to. Her school didn't pursue it, the school was Saybrook. The new head of psychologist, Norman Sanders, didn't like her school. Last marriage, miscarriages, job. Never got LICSW (only an LCSW). M.S. P.P. was willing to admit her b. that to work out. Thought re. getting licensed in NY state. She'd applied for teaching positions. She's been doing trading. Doesn't know what to do w/ rest of her life. Goal is to get license. She is now living Saybrook. Her lawyer ^{contract} Dan Finn in Newton. She has 180K in school loans. Spent 9 years in school. Wants her tuition back. Her lawyer is a Newton firm... saybrook knew in 1998. Finds herself exhausted, dysphoric.

Her father ^{Ken} left in 1987 - he had a large company - he called in 2000 - he became quadriplegic - car accident - he's a shut-in now. He's back in the family. The company was in trouble. Cathy + Diane refused to cover the company. She (pt) dipped in - the stress was overwhelming - she had to meet a buyer after buyer. Her work was horrible - it was "my parents' security." She secured 100K/year for a parents. "I w. like a stuck rat - I couldn't abandon my parents." Doesn't want to start again. She's very hurt over the loss of Ph.D. + career - she felt she is on a pretty good track. Is blackballed at MGH. Loves house. Last 3 yrs. it's made 30K, 30K + 47K. Still getting along w/ sisters. Her fa. to drink any re. sees ex-husband from time-to-time.

Hesitant re. SSRI or ^{other} anti-depressant. Bob - ex-husband, Is waking up at 4:30 AM - or neurovegetative sx - "Irish, stoic, never take medicines." It's an internal heaviness - it's like I'm pretending - I'm f. perky - it's such a drag. Feels it wld be too much to go again. Goes to bed ~ 10 - asleep by 11 - wakes ~ 4:30 - has to be napping. She feels "wobbly + hazy" at times. She's dealt w/ a Karen Schwartz at the Massachusetts Board. We discussed options incl. ① Anti-deps + ② Sleep meds but S.C. chooses, for now, to hold off.

5/16/05 Things k. of the same. Hurt her shoulder shovelling wood chips. 90% better, doing extended family over for a spring party SAT. Wakes up 9:30, i.e. 11-200 run 3:30-6:00. As gusto when sleep deprived. Frustrated re job issue - friend, Anna, is just getting new office in Manhattan. Judge wants Discovery by Dec, media. conf. by March, jury by April 2006. - president is Norman O'Hara (of Saybrook). She wants 200K in school loans back. She grad. Some pain for her is that she feels she did need... D. R. M.D.

Loves her house - doesn't want to move. Real estate is going slowly. She feels a crummy saleswoman. B+W has on-call jobs, 20 hr. late at night. Did get a job at Russell as psych teacher - \$1200. Didn't get job at Harvard, still looking for jobs. Dean at JFK school. Joe McCarthy. Doesn't want to take anything for sleep. Thinks it is reasonable to react as she is. She fears losing control on an SSR1 - "I'm a control freak" is not taking calls from family - "listening to Dean pulls me down." Car needed a 600 pair. Tired of drink. of \$1. Think of Hipp. Re house - but 400K equity is too high. Finds self anxious - nervous re. elevators. Lawyer is in a penthouse & only an elevator, when stressed needs > control. She h. no patience & self. It passed & 10 yrs (celebr. days). She turned down meds for shoulder pain -

If we use an SSR1: goals.

- ① ↓ anxiety → ↑ sleep
- ② ↓ depression
- ③ → > flexible defenses (↓ obsessions).

D. J. Lee, M.D.

5/26 Came - Doing better - Had a big family party SAT. - 50-60 relatives - BBQ → along. It was nice, healing. She's slept well for past five days. PGF was alcoholic. Her Mo. had 7 bros + sisters - Re Sullivan clan - 4 families of children. A good distraction by trading - \$500/week. She taught herself how to do this. She bonds & father through trading. "He's not greedy." Ex-husb's Bob & Paul came to family party. Paul - 6'4" - 210 lbs. Guy - worked in Conn MA - left to go to Hvd for Masters in Public Admin. - was a bit getting into - they were in a few yrs. - He wanted kids - born-again Chris. msn. Repub. - He didn't adopt kids - his Mo. w. mentally ill - paternal uncles died, & after died, between age 42-44 - heart disease. Paul is stalwart + stoic. His bro + turn after abandoned ship + Paul covered the bases & Re Mo. Paul had v. flat affect - he's mother suicided - Paul h. been told, "We're good friends." She decided to get divorce bec. he w. v. depressing & his depression + he'd become irritable. He won't get back together. Divorced 3 yrs. ago. Feels she's in "pause mode" re. dating - needs focus so that she can get work - worry re. the house. Her folks are troubled. Pa. lives & pt's sister in 2 family in W. Roxbury - Dine. Cathy - single - never re. he's 51 - does real estate - was Pres. Grand Circle Travel. - She left 6 yrs. ago - her boss took her back. She's on a long sabbatical - does real estate. Pa. is back & 4 yrs. - Pa. is totally not grateful. Pa. got angry + shrunken. Pt. tried to rescue Cooney Industries & her Mother. Sees her Mother as smart + savvy.

Imp - Better

Plan - Sean Zuck.

D. J. Lee, M.D.

Susan Conney Durr 8/19/55 49

1445 Centre St

TX 78604-1464-01

Newton 02459 300.14

11/1/25

2). 617-699-5662

Magellany

3). 617 69 630-0661

Auth 2005 04 150600 021

48hr

#150-

Paul Durr 1/23/60

4/19/05 Come. Pd 25

177auth, 4/15 ft

Ins in 4/19/05

5/1/05 case

Rec 95 4/19/25

5/26 case Pd 25

6/1 Ins in 5/05

6/9 case Pd 25

Rec 154 5/05 (50)

7/1 Ins in 6/9

7/14 case Pd 50

Rec 77 6/9 (25)

8/1 Ins in 7/14

8/15 NS by ins.

6/8 8/12 case Pd 50

Rec 77 7/14 (25)

8/18 Ins in 8/05

Rec 154 8/05 (50)